

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE:

MCCARTHY BARNES, JR.

Debtor

Case No.: 14-36455-KRH

Chapter 7

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AMERICREDIT FINANCIAL SERVICES, INC.,  
d/b/a GM FINANCIAL

Plaintiff

v.

MCCARTHY BARNES, JR.

Debtor/Defendant

**ANSWER**

COMES NOW, McCarthy Barnes, Jr., (Debtor/defendant), by counsel, and  
answers as follows:

1. Debtor/defendant admits the allegations contained in paragraphs 1, 2, 3 and 4  
of Plaintiff's Complaint.

2. Debtor/defendant is without sufficient information to admit or deny the  
allegations contained in paragraphs 5, 6, 7 and 8 of Plaintiff's Complaint.

3. Debtor/defendant hereby joins in the Motion for Relief from Stay filed herein  
by Plaintiff.

Yvonne Cochran, VSB #26015  
COCHRAN LAW FIRM, P.C.  
4509 West Broad Street  
Richmond, Virginia 23230  
(804) 358-2222  
*Counsel for Debtor/Defendant*

WHEREFORE, Debtor/defendant asks that Plaintiff's Motion be granted, and that he have such other relief as the Court deems just and proper.

MCCARTHY BARNES, JR.

By: /s/ Yvonne Cochran  
Yvonne Cochran, VSB #26015  
COCHRAN LAW FIRM, P.C.  
4509 West Broad Street  
Richmond, VA 23230  
(804) 358-2222  
*Counsel for Debtor/Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of December, 2014, the following person(s) were served electronically via the CM/ECF system, or were mailed a copy of the foregoing Answer by first class mail, postage prepaid:

Sara A. John, Esquire  
M. Richard Epps, P.C.  
605 Lynnhaven Parkway  
Virginia Beach, VA 23452  
*Counsel for Plaintiff*

Harry Shaia, Jr., Trustee  
8550 Mayland Avenue  
Richmond, VA 23294

/s/ Yvonne Cochran  
Yvonne Cochran, VSB #26015